

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LEON STAMBLER,

Plaintiff,

v.

ALLY FINANCIAL INC., et al.,

Defendants.

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CIVIL ACTION NO. 2:12-cv-608

JURY TRIAL DEMANDED

LEAD CASE

**AGREED MOTION TO DISMISS DEFENDANTS AMERIPRISE FINANCIAL, INC.
AND AMERIPRISE BANK, FSB WITH PREJUDICE**

Pursuant to Fed. R. Civ. P. 41(a)(2) and (c), Plaintiff Leon Stambler (“Plaintiff”) and Defendants Ameriprise Financial, Inc. and Ameriprise Bank, FSB (together, “Ameriprise Bank”) move the Court to dismiss with prejudice from the above-entitled and numbered cause any and all claims by Stambler against Ameriprise Bank and to dismiss with prejudice all claims by Ameriprise Bank against Stambler. Each party shall bear its own costs and attorneys’ fees. A proposed order is attached.

Dated: September 11, 2013

Respectfully submitted,

/s/ Brent N. Bumgardner

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of September, 2013, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Brent N. Bumgardner

CERTIFICATE OF CONFERENCE

I certify that on September 10, 2013, I conferred with counsel for Defendants Ameriprise Financial, Inc. and Ameriprise Bank, FSB and they are in agreement with this motion.

/s/ Brent N. Bumgardner